

Filed Under Seal JFL

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

5
Filed Under Seal

UNITED STATES OF AMERICA

: CRIMINAL NO. 18cr 291
v. : DATE FILED: 7/10/18

AHMAD BECOATE

: VIOLATIONS:
JEFFREY ROACH 18 U.S.C. § 371 (conspiracy) (1 count)
JETHRO RICHARDSON 18 U.S.C. § 1343 (wire fraud) (3 counts)
NATHANIEL JONES 18 U.S.C. § 513(a) (uttering
JARED MILLER counterfeit securities) (3 counts)
JUQUAN HARVEY 18 U.S.C. § 1028A (aggravated identity
theft (6 counts)
FILED JUL 10 2018 42 U.S.C. § 408(a)(7)(B) (misuse of a
: social security number) (1 count)
: 18 U.S.C. § 2 (aiding and abetting)
: Notice of forfeiture

KATE DARKMAN, Clerk
By bms Dep. Clerk

INDICTMENT

COUNT ONE

(Conspiracy)

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

Introduction

1. Walmart, Inc. ("Walmart") was a corporation doing business in interstate commerce that maintained store locations throughout the United States, including in Pennsylvania, Delaware, Maryland and New Jersey.
2. Bank of America ("BofA") was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"), under certificate no. 25178.
3. Bank of Mellon, NY ("BNY") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 7946.

4. Branch Banking & Trust Company ("BB&T") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 9846.

5. Capital One Bank N.A. ("Capital One") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 33954.

6. Central Bank of Jefferson, MO ("Jefferson Bank") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 12633.

7. Citibank N.A. was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 7213.

8. Crossfirst Bank ("Crossfirst") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 58648.

9. Deutsche Bank of Delaware ("Deutsche Bank") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 26392.

10. First Bank of Southern Pines, NC ("First Bank") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 15019.

11. Heritage Bank of Nevada ("Heritage") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 34072.

12. Huntington Bank ("Huntington") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 23758.

13. Iberia Bank ("Iberia") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 28100.

14. International Bank of Commerce ("International") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 19629.

15. JP Morgan Chase Bank ("Chase") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 628.

16. KeyBank N.A. ("KeyBank") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 17534.

17. Pacific City Bank ("Pacific") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 57463.

18. PNC Bank ("PNC") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 6384.

19. Tennessee Valley Federal Credit Union ("TVFCU") was a financial institution, the deposits of which were insured by the National Credit Union Administration ("NCUA"), under certificate no. 1520.

20. Truliant Federal Credit Union ("Truliant FCU") was a financial institution, the deposits of which were insured by the NCUA, under certificate no. 7840.

21. Wells Fargo Bank ("Wells Fargo") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 25890.

22. The Southeastern Pennsylvania Transportation Authority ("SEPTA") was a regional public transit authority that provided bus, trolley, subway/elevated rail line, commuter and light rail transportation to millions of people in Philadelphia, Delaware, Montgomery, Bucks and Chester Counties.

23. Walmart, SEPTA and the financial institutions listed above at paragraphs 2 through 22 were organizations which operated in, and the activities of which affected, interstate commerce.

24. Fidelity Information Services ("FIS") was a company that provided, among other things, check management services and solutions for collecting outstanding debts for companies including Walmart and other retail stores. Walmart permitted customers to cash payroll checks at certain of its stores. When a customer presented a payroll check to a Walmart employee for cashing, the customer was required to enter his or her social security number ("SSN") into a keypad. The Walmart employee scanned the check through a check reader. The account number of the account on which the payroll check was drawn, along with that bank's routing number, along with the SSN and any other information provided by the customer, was transmitted via interstate wire transmission from the Walmart store's computer system to FIS's computer servers located in either Chicago, Illinois or St. Petersburg, Florida. FIS analyzed the data provided, then transmitted an interstate wire communication from its computer servers back to the Walmart store, recommending acceptance or declination of the payroll check.

The Conspiracy

25. Beginning on a date unknown to the grand jury, but believed to be no later than June 2016, and continuing until at least May 2018, the exact dates being unknown to the grand jury, in the Eastern District of Pennsylvania and elsewhere, defendants

**AHMAD BECOATE,
JEFFREY ROACH,
JETHRO RICHARDSON,
NATHANIEL JONES,
JARED MILLER, and
JUQUAN HARVEY**

knowingly and intentionally combined, conspired and agreed with each other and others, both known and unknown to the grand jury, to commit the following offenses against the United States, that is, to

- a. knowingly possess and utter counterfeited securities with intent to deceive another person and organization, in violation of Title 18, United States Code, Section 513(a), and
- b. knowingly and with the intent to defraud, devise and intend to devise a scheme to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, by means of wire communication in interstate commerce, in violation of Title 18, United States Code, Section 1343.

Manner and Means

26. It was the purpose of the conspiracy for the conspirators to get United States currency from financial institutions and other organizations by fraud, including by creating and passing counterfeit checks and fraudulently using the identification of other people.

27. It was part of the conspiracy that the conspirators fraudulently obtained checks, identifications and bank account and identification information of various people to use in passing and attempting to pass counterfeit checks at Walmart stores throughout the United States.

It was further part of the conspiracy that:

28. The conspirators used counterfeit checks that resembled payroll checks, purportedly drawn upon financial institutions which were organizations that operated in and affected interstate commerce.

29. The conspirators used bank account numbers of actual victim businesses, including SEPTA, which were organizations and operated in and affected interstate commerce.

30. The conspirators flew via commercial airlines to various states including Arizona, Texas and Utah, among others, where they rented cars and drove from place to place to various Walmart stores for the purpose of cashing counterfeit payroll checks.

31. The conspirators presented, attempted to cash, and cashed, counterfeit payroll checks totaling over \$700,000 at various Walmart stores in the Eastern District of Pennsylvania and elsewhere. The presentation of counterfeit payroll checks at Walmart stores caused the checks to be presented for payment to the financial institutions on which the counterfeit checks purported to have been drawn.

Overt Acts

In furtherance of the conspiracy, and to accomplish its objectives, defendants AHMAD BECOATE, JEFFREY ROACH, JETHRO RICHARDSON, NATHANIEL JONES, JARED MILLER, JUQUAN HARVEY and others known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere: on or about the dates below, the defendants cashed and attempted to cash the counterfeit checks listed, against the business accounts listed, at the Walmart store locations identified, for the amounts and using the social security numbers listed:

| Overt Act | Date | Defendant | Check No. | Amount | Walmart Location | SSN | Alleged Drawee Bank | Alleged Account Holder |
|-----------|--------|---------------|-----------|----------|------------------|-------|---------------------|------------------------|
| 1 | 1/5/17 | Jeffrey Roach | 5887633 | \$306.12 | Leesburg VA | x1414 | PNC | SEPTA |
| 2 | 1/5/17 | Jeffrey Roach | 5887618 | \$228.26 | Leesburg VA | x1414 | PNC | SEPTA |
| 3 | 1/5/17 | Jeffrey Roach | 5887632 | \$307.62 | Winchester VA | x1150 | PNC | SEPTA |
| 4 | 1/5/17 | Jeffrey Roach | 5887614 | \$400.82 | Winchester VA | x1150 | PNC | SEPTA |

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| 5 | 1/5/17 | Jeffrey Roach | 5887629 | \$400.41 | Winchester VA | x4689 | PNC | SEPTA |
| 6 | 1/5/17 | Jeffrey Roach | 5887616 | \$308.56 | Winchester VA | x2160 | PNC | SEPTA |
| 7 | 1/5/17 | Jeffrey Roach | 5887631 | \$305.35 | Winchester VA | x2160 | PNC | SEPTA |
| 8 | 1/5/17 | Jeffrey Roach | 5887619 | \$224.62 | Front Royal VA | x4470 | PNC | SEPTA |
| 9 | 1/5/17 | Jeffrey Roach | 5887630 | \$306.18 | Front Royal VA | x4470 | PNC | SEPTA |
| 10 | 1/5/17 | Jeffrey Roach | 5887617 | \$307.73 | Woodstock VA | x6825 | PNC | SEPTA |
| 11 | 1/5/17 | Jeffrey Roach | 5887621 | \$233.26 | Woodstock VA | x6825 | PNC | SEPTA |
| 12 | 1/5/17 | Jeffrey Roach | 5887620 | \$233.15 | Timberville VA | x2220 | PNC | SEPTA |
| 13 | 1/5/17 | Jeffrey Roach | 5887626 | \$306.25 | Timberville VA | x2220 | PNC | SEPTA |
| 14 | 1/5/17 | Jeffrey Roach | 5887628 | \$307.75 | Harrisonburg VA | x6156 | PNC | SEPTA |
| 15 | 1/5/17 | Jeffrey Roach | 5887627 | \$308.98 | Harrisonburg VA | x6156 | PNC | SEPTA |
| 16 | 1/5/17 | Jeffrey Roach | 5887622 | \$229.00 | Harrisonburg VA | x1548 | PNC | SEPTA |
| 17 | 1/5/17 | Jeffrey Roach | 5887624 | \$230.18 | Harrisonburg VA | x1548 | PNC | SEPTA |
| 18 | 1/5/17 | Jeffrey Roach | 5887625 | \$229.82 | Rockingham VA | x1641 | PNC | SEPTA |
| 19 | 1/5/17 | Jeffrey Roach | 5887623 | \$227.41 | Rockingham VA | x1641 | PNC | SEPTA |
| 20 | 1/6/17 | Jeffrey Roach | 5887665 | \$400.85 | Staunton VA | x8862 | PNC | SEPTA |
| 21 | 1/6/17 | Jeffrey Roach | 5887640 | \$309.78 | Staunton VA | x8862 | PNC | SEPTA |
| 22 | 1/6/17 | Jeffrey Roach | 5887641 | \$308.21 | Waynesboro VA | x7780 | PNC | SEPTA |
| 23 | 1/6/17 | Jeffrey Roach | 5887664 | \$225.75 | Waynesboro VA | x7780 | PNC | SEPTA |
| 24 | 1/6/17 | Jeffrey Roach | 5887662 | \$400.63 | Waynesboro VA | x2090 | PNC | SEPTA |
| 25 | 1/6/17 | Jeffrey Roach | 5887642 | \$307.54 | Waynesboro VA | x2090 | PNC | SEPTA |
| 26 | 1/6/17 | Jeffrey Roach | 5887643 | \$307.42 | Charlottesville VA | x7391 | PNC | SEPTA |

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| 27 | 1/6/17 | Jeffrey Roach | 5887660 | \$400.17 | Ruckersville VA | x6351 | PNC | SEPTA |
| 28 | 1/6/17 | Jeffrey Roach | 5887645 | \$303.66 | Lexington VA | x7950 | PNC | SEPTA |
| 29 | 1/6/17 | Jeffrey Roach | 5887659 | \$228.75 | Lexington VA | x7950 | PNC | SEPTA |
| 30 | 1/6/17 | Jeffrey Roach | 5887658 | \$223.20 | Roanoke VA | x9409 | PNC | SEPTA |
| 31 | 1/6/17 | Jeffrey Roach | 5887646 | \$306.77 | Roanoke VA | x9409 | PNC | SEPTA |
| 32 | 1/6/17 | Jeffrey Roach | 5887647 | \$308.71 | Roanoke VA | x7617 | PNC | SEPTA |
| 33 | 1/6/17 | Jeffrey Roach | 5887657 | \$228.85 | Roanoke VA | x7617 | PNC | SEPTA |
| 34 | 1/6/17 | Jeffrey Roach | 5887648 | \$307.12 | Roanoke VA | x7061 | PNC | SEPTA |
| 35 | 1/6/17 | Jeffrey Roach | 5887656 | \$225.55 | Roanoke VA | x7061 | PNC | SEPTA |
| 36 | 1/6/17 | Jeffrey Roach | 5887655 | \$227.18 | Roanoke VA | x5404 | PNC | SEPTA |
| 37 | 1/6/17 | Jeffrey Roach | 5887649 | \$309.87 | Roanoke VA | x5404 | PNC | SEPTA |
| 38 | 1/6/17 | Jeffrey Roach | 5887650 | \$307.52 | Salem VA | x1378 | PNC | SEPTA |
| 39 | 1/6/17 | Jeffrey Roach | 5887654 | \$225.37 | Salem VA | x1378 | PNC | SEPTA |
| 40 | 1/6/17 | Jeffrey Roach | 5887663 | \$306.25 | Roanoke VA | x2767 | PNC | SEPTA |
| 41 | 1/6/17 | Jeffrey Roach | 5887652 | \$225.60 | Bedford VA | x3807 | PNC | SEPTA |
| 42 | 1/6/17 | Jeffrey Roach | 5887651 | \$227.24 | Bedford VA | x3807 | PNC | SEPTA |
| 43 | 1/7/17 | Ahmad Becoate | 5887833 | \$228.48 | Landover Hills MD | x3850 | PNC | SEPTA |
| 44 | 1/7/17 | Ahmad Becoate | 5887762 | \$305.18 | Landover Hills MD | x3850 | PNC | SEPTA |
| 45 | 1/7/17 | Ahmad Becoate | 5887774 | \$306.07 | Bowie MD | x1183 | PNC | SEPTA |
| 46 | 1/7/17 | Ahmad Becoate | 5887767 | \$405.89 | Bowie MD | x1183 | PNC | SEPTA |
| 47 | 1/7/17 | Ahmad Becoate | 5887756 | \$308.08 | Pasadena MD | x7304 | PNC | SEPTA |
| 48 | 1/7/17 | Ahmad Becoate | 5887764 | \$403.95 | Pasadena MD | x7304 | PNC | SEPTA |

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| 49 | 1/7/17 | Ahmad Becoate | 5887771 | \$401.09 | Severn MD | x6852 | PNC | SEPTA |
| 50 | 1/7/17 | Ahmad Becoate | 5887761 | \$307.49 | Severn MD | x6852 | PNC | SEPTA |
| 51 | 1/7/17 | Ahmad Becoate | 5887770 | \$303.72 | Glen Burnie MD | x7880 | PNC | SEPTA |
| 52 | 1/7/17 | Ahmad Becoate | 5887769 | \$404.51 | Glen Burnie MD | x7880 | PNC | SEPTA |
| 53 | 1/7/17 | Ahmad Becoate | 5887765 | \$155.01 | Glen Burnie MD | x7880 | PNC | SEPTA |
| 54 | 1/8/17 | JuQuan Harvey | 271230261 | \$306.77 | Haymarket VA | x7650 | Deutsche Bank | Fidelity Management |
| 55 | 1/8/17 | JuQuan Harvey | 271230276 | \$400.58 | Haymarket VA | x7650 | Deutsche Bank | Fidelity Management |
| 56 | 1/8/17 | Jeffrey Roach | 5887695 | \$400.85 | Alexandria VA | x8479 | PNC | SEPTA |
| 57 | 1/8/17 | Jeffrey Roach | 5887670 | \$309.78 | Alexandria VA | x8479 | PNC | SEPTA |
| 58 | 1/8/17 | Jeffrey Roach | 5887694 | \$400.87 | Hybla Valle VA | x7033 | PNC | SEPTA |
| 59 | 1/8/17 | Jeffrey Roach | 5887690 | \$400.58 | Alexandria VA | x3287 | PNC | SEPTA |
| 60 | 1/8/17 | Jeffrey Roach | 5887689 | \$400.17 | Burke VA | x9118 | PNC | SEPTA |
| 61 | 1/8/17 | Jeffrey Roach | 5887673 | \$307.42 | Burke VA | x9118 | PNC | SEPTA |
| 62 | 1/8/17 | Jeffrey Roach | 5887674 | \$305.12 | Fairfax VA | x1322 | PNC | SEPTA |
| 63 | 1/8/17 | Jeffrey Roach | 5887693 | \$225.75 | Fairfax VA | x1322 | PNC | SEPTA |
| 64 | 1/8/17 | Jeffrey Roach | 5887675 | \$303.66 | Fairfax VA | x7910 | PNC | SEPTA |
| 65 | 1/8/17 | Jeffrey Roach | 5887688 | \$228.75 | Fairfax VA | x7910 | PNC | SEPTA |
| 66 | 1/8/17 | Jeffrey Roach | 5887676 | \$306.77 | Chantilly VA | x5361 | PNC | SEPTA |
| 67 | 1/8/17 | Jeffrey Roach | 5887687 | \$228.85 | Chantilly VA | x5361 | PNC | SEPTA |
| 68 | 1/9/17 | JuQuan Harvey | 271230292 | \$308.71 | Spotsylvania VA | x1168 | Deutsche Bank | Fidelity Management |
| 69 | 1/9/17 | JuQuan Harvey | 271230294 | \$309.87 | Spotsylvania VA | x1168 | Deutsche Bank | Fidelity Management |
| 70 | 1/9/17 | Jeffrey Roach | 5887677 | \$308.71 | Greenville NC | x0602 | PNC | SEPTA |

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| 71 | 1/9/17 | Jeffrey Roach | 5887686 | \$225.55 | Greenville NC | x0602 | PNC | SEPTA |
| 72 | 1/9/17 | Jeffrey Roach | 5887700 | \$309.78 | Greenville NC | x7399 | PNC | SEPTA |
| 73 | 1/9/17 | Jeffrey Roach | 5887725 | \$400.85 | Greenville NC | X7399 | PNC | SEPTA |
| 74 | 1/9/17 | Jeffrey Roach | 5887721 | \$400.63 | Greenville NC | x6383 | PNC | SEPTA |
| 75 | 1/9/17 | Jeffrey Roach | 5887702 | \$307.54 | Greenville NC | x6383 | PNC | SEPTA |
| 76 | 1/9/17 | Jeffrey Roach | 5887703 | \$307.42 | Washington NC | x3874 | PNC | SEPTA |
| 77 | 1/9/17 | Jeffrey Roach | 5887720 | \$400.58 | Washington NC | x3874 | PNC | SEPTA |
| 78 | 1/9/17 | Jeffrey Roach | 5887719 | \$400.17 | Williamston NC | x6641 | PNC | SEPTA |
| 79 | 1/9/17 | Jeffrey Roach | 5887704 | \$305.12 | Williamston NC | x6641 | PNC | SEPTA |
| 80 | 1/17/17 | Jethro Richardson | 111347 | \$216.31 | Sioux Falls SD | x5486 | First Bank | CBIZ Benefits and Insurance Services |
| 81 | 1/17/17 | Jethro Richardson | 111328 | \$214.71 | Sioux Falls SD | x5486 | First Bank | CBIZ Benefits and Insurance Services |
| 82 | 1/18/17 | Jethro Richardson | 12415744 | \$216.52 | Lincoln NE | x9917 | Central Bank | ATT Mobility |
| 83 | 1/18/17 | Jethro Richardson | 12415755 | \$214.37 | Lincoln NE | x9917 | Central Bank | ATT Mobility |
| 84 | 1/19/17 | Jethro Richardson | 214849 | \$216.75 | Shawnee KS | x0209 | PNC | Wal-Mart PA Class |
| 85 | 1/19/17 | Jethro Richardson | 214930 | \$215.26 | Shawnee KS | x0209 | PNC | Wal-Mart PA Class |
| 86 | 1/29/17 | Jethro Richardson | 11530 | \$218.41 | Kendallville IN | x2298 | Int'l Bank of Commerce | R.B. |
| 87 | 1/29/17 | Jethro Richardson | 11530 | \$218.41 | Kendallville IN | x4957 | Int'l Bank of Commerce | R.B. |
| 88 | 1/29/17 | Jethro Richardson | 11495 | \$220.45 | Kendallville IN | x4957 | Int'l Bank of Commerce | R.B. |

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| 89 | 1/29/17 | Jethro Richardson | 11495 | \$220.45 | Kendallville IN | x4957 | Int'l Bank of Commerce | R.B. |
| 90 | 1/29/17 | Jethro Richardson | 17497 | \$217.45 | Shelby Township MI | x7370 | Wells Fargo | Fresh-point Atlanta Inc. |
| 91 | 1/29/17 | Jethro Richardson | 17468 | \$214.75 | Shelby Township MI | x7370 | Wells Fargo | Fresh-point Atlanta Inc. |
| 92 | 1/29/17 | Jethro Richardson | 17468 | \$214.75 | Shelby Township MI | x7178 | Wells Fargo | Fresh-point Atlanta Inc. |
| 93 | 1/30/17 | Jethro Richardson | 12798 | \$219.19 | Chandler AZ | x6433 | KeyBank | None – fake account |
| 94 | 1/30/17 | Jethro Richardson | 11496 | \$214.77 | Cortez CO | x5393 | Int'l Bank of Commerce | R.B. |
| 95 | 1/31/17 | JuQuan Harvey | 11518 | \$217.77 | Fountain CO | X9426 | Int'l Bank of Commerce | R.B. |
| 96 | 2/24/17 | Jeffrey Roach | 100094205 | \$226.66 | Stanford KY | x1929 | NC State Treasurer | State of North Carolina |
| 97 | 2/24/17 | Jeffrey Roach | 100094199 | \$307.20 | Stanford KY | x1929 | NC State Treasurer | State of North Carolina |
| 98 | 4/12/17 | Jeffrey Roach | 117006 | \$306.24 | Unicoi TN | x8376 | Wells Fargo | Zazzle Inc. |
| 99 | 4/12/17 | Jeffrey Roach | 117016 | \$232.55 | Unicoi TN | x8376 | Wells Fargo | Zazzle Inc. |
| 100 | 4/12/17 | Jeffrey Roach | 117006 | \$306.24 | Unicoi TN | x8376 | Wells Fargo | Zazzle Inc. |
| 101 | 4/12/17 | Jeffrey Roach | 117008 | \$305.91 | Johnson City TN | x0569 | Wells Fargo | Zazzle Inc. |
| 102 | 4/12/17 | Jeffrey Roach | 117015 | \$235.15 | Johnson City TN | x0569 | Wells Fargo | Zazzle Inc. |
| 103 | 4/18/17 | Jeffrey Roach | 2446418 | \$238.78 | Rocky Mount, NC | x8116 | BNY Mellon | PECO Energy |
| 104 | 4/18/17 | Jeffrey Roach | 2246423 | \$170.93 | Rocky Mount, NC | x8116 | BNY Mellon | PECO Energy |
| 105 | 4/18/17 | Jethro Richardson | 16385 | \$228.75 | Rocky Mount, NC | x4584 | Heritage Bank of Nevada | Vroman-Wildes Family Trust |
| 106 | 4/18/17 | Jethro Richardson | 16386 | \$119.72 | Rocky Mount, NC | x4584 | Heritage Bank of Nevada | Vroman-Wildes Family Trust |

| Overt Act | Date | Defendant | Check No. | Amount | Walmart Location | SSN | Alleged Drawee Bank | Alleged Account Holder |
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| 107 | 4/19/17 | Jethro Richardson | 16345 | \$119.52 | Cameron NC | x8747 | Heritage Bank of Nevada | Vroman-Wildes Family Trust |
| 108 | 4/19/17 | Jethro Richardson | 16272 | \$227.72 | Cameron NC | x8747 | Heritage Bank of Nevada | Vroman-Wildes Family Trust |
| 109 | 4/19/17 | Jeffrey Roach | 204374 | \$307.69 | High Point, NC | x2935 | PNC | TGSM |
| 110 | 4/19/17 | Jared Miller | 204365 | \$189.61 | High Point, NC | x1605 | PNC | TGSM |
| 111 | 4/20/17 | Jared Miller | 204384 | \$176.75 | Greensboro NC | x5105 | PNC | Triumph Gear Systems Macomb Inc. |
| 112 | 4/20/17 | Jared Miller | 204385 | \$186.99 | Greensboro NC | x5105 | PNC | Triumph Systems Macomb Inc. |
| 113 | 4/28/17 | Nathaniel Jones | 592987 | \$277.99 | Mayodan NC | x4001 | Crossfirst | FQSR LLC |
| 114 | 4/28/17 | Nathaniel Jones | 592987 | \$277.99 | Mayodan NC | x2574 | Crossfirst | FQSR LLC |
| 115 | 4/28/17 | Nathaniel Jones | 593333 | \$168.55 | Mayodan NC | x2574 | Crossfirst | FQSR LLC |
| 116 | 4/28/17 | Nathaniel Jones | 593333 | \$168.55 | Mayodan NC | x6415 | Crossfirst | FQSR LLC |
| 117 | 4/28/17 | Jethro Richardson | 11857 | \$119.37 | Madison Heights VA | x6491 | PNC | Ulery Dental and Ortho |
| 118 | 4/28/17 | Jethro Richardson | 11758 | \$220.47 | Madison Heights VA | x6491 | PNC | Ulery Dental and Ortho |
| 119 | 5/1/17 | Jared Miller | 613360 | \$177.47 | Kannapolis NC | x5999 | Tennessee Valley FCU | None-fake account |
| 120 | 5/1/17 | Jared Miller | 613527 | \$185.71 | Kannapolis NC | x5999 | Tennessee Valley FCU | None-fake account |
| 121 | 5/1/17 | Jared Miller | 613527 | \$185.71 | Kannapolis NC | x4336 | Tennessee Valley FCU | None-fake account |
| 122 | 5/1/17 | Jared Miller | 613528 | \$184.76 | Asheboro NC | x7517 | Tennessee Valley FCU | None-fake account |
| 123 | 5/1/17 | Jared Miller | 613362 | \$174.28 | Asheboro NC | x7517 | Tennessee Valley FCU | None-fake account |

| Overt Act | Date | Defendant | Check No. | Amount | Walmart Location | SSN | Alleged Drawee Bank | Alleged Account Holder |
|-----------|---------|-------------------|------------|----------|----------------------|-------|--------------------------|---|
| 124 | 5/1/17 | Jared Miller | 613529 | \$186.37 | Lexington NC | x2334 | Tennessee Valley FCU | None-fake account |
| 125 | 5/1/17 | Jared Miller | 613361 | \$178.56 | Lexington NC | x2334 | Tennessee Valley FCU | None-fake account |
| 126 | 5/9/17 | Jeffrey Roach | 874395 | \$312.14 | Somersworth NH | x6992 | Huntington National Bank | Mahoning County Treasurer |
| 127 | 5/9/17 | Jeffrey Roach | 874389 | \$239.77 | Somersworth NH | x6992 | Huntington National Bank | Mahoning County Treasurer |
| 128 | 5/13/17 | Jethro Richardson | 11648 | \$118.56 | Huntsville AL | x5117 | Bank of America | Gulf Coast Tropical Fruit & Produce Co. |
| 129 | 5/13/17 | Jethro Richardson | 11517 | \$218.72 | Huntsville AL | x5117 | Bank of America | Gulf Coast Tropical Fruit & Produce Co. |
| 130 | 5/13/17 | Jethro Richardson | 11651 | \$118.56 | Madison AL | x2146 | Bank of America | Gulf Coast Tropical Fruit & Produce Co. |
| 131 | 5/13/17 | Jethro Richardson | 11515 | \$217.62 | Madison AL | x2146 | Bank of America | Gulf Coast Tropical Fruit & Produce Co. |
| 132 | 5/13/17 | Jethro Richardson | 11515 | \$217.62 | Madison AL | x4346 | Bank of America | Gulf Coast Tropical Fruit & Produce Co. |
| 133 | 5/13/17 | Jethro Richardson | 12479 | \$119.46 | Huntsville AL | x1770 | Pacific City Bank | Feng Mao Inc. |
| 134 | 5/13/17 | Jethro Richardson | 12322 | \$218.56 | Huntsville AL | x1770 | Pacific City Bank | Feng Mao Inc. |
| 135 | 6/2/17 | Nathaniel Jones | 1009769928 | \$296.44 | South Boston VA | x6865 | Chase | Paylocity Corp. |
| 136 | 6/2/17 | Nathaniel Jones | 1009769926 | \$168.55 | South Boston VA | x6865 | Chase | Paylocity Corp. |
| 137 | 7/24/17 | Jeffrey Roach | 766454 | \$228.22 | Houston TX | x9700 | Wells Fargo | Whole Foods Market |
| 138 | 7/24/17 | Jeffrey Roach | 766449 | \$308.35 | Houston TX | x9700 | Wells Fargo | Whole Foods Market |
| 139 | 7/24/17 | Jeffrey Roach | 766448 | \$224.12 | Houston TX | x9700 | Wells Fargo | Whole Foods Market |
| 140 | 8/20/17 | Jeffrey Roach | 41616162 | \$230.02 | North Little Rock AR | x5330 | Bank of America | Liberty Mutual Insurance |

| Overt Act | Date | Defendant | Check No. | Amount | Walmart Location | SSN | Alleged Drawee Bank | Alleged Account Holder |
|-----------|----------|---------------|-----------|----------|---------------------|-------|---------------------|-----------------------------------|
| 141 | 9/12/17 | Jeffrey Roach | 1003457 | \$308.63 | Spotsylvania VA | x4279 | BB&T Bank | SNM Foods |
| 142 | 9/12/17 | Jeffrey Roach | 1003453 | \$232.36 | Spotsylvania VA | x4279 | BB&T Bank | SNM Foods |
| 143 | 9/20/17 | Jeffrey Roach | 614156 | \$242.69 | Colorado Springs CO | x8277 | Chase | BL Restaurant Operations LLC |
| 144 | 9/20/17 | Jeffrey Roach | 614508 | \$234.34 | Colorado Springs CO | x8277 | Chase | BL Restaurant Operations LLC |
| 145 | 9/22/17 | JuQuan Harvey | 20928 | \$242.83 | Dulles VA | x0741 | BB&T | The Lodge A Sportsman Grill 2 LLC |
| 146 | 9/22/17 | JuQuan Harvey | 21275 | \$233.45 | Dulles VA | x0741 | BB&T | The Lodge A Sportsman Grill 2 LLC |
| 147 | 9/23/17 | Jeffrey Roach | 1003811 | \$233.45 | Layton UT | x3406 | BB&T | SNM Foods |
| 148 | 9/23/17 | Jeffrey Roach | 1003461 | \$242.83 | Layton UT | x3406 | BB&T | SNM Foods |
| 149 | 9/30/17 | JuQuan Harvey | 5184579 | \$244.55 | Seaford DE | x0812 | Wells Fargo | BCBS of NC |
| 150 | 9/30/17 | JuQuan Harvey | 5184917 | \$233.45 | Seaford DE | x0812 | Wells Fargo | BCBS of NC |
| 151 | 9/30/17 | Jeffrey Roach | 30893 | \$245.10 | Columbus OH | x8333 | Truliant FCU | Phillippi Investments Inc. |
| 152 | 9/30/17 | Jeffrey Roach | 30893 | \$245.10 | Columbus OH | x8333 | Truliant FCU | Phillippi Investments Inc. |
| 153 | 9/30/17 | Jeffrey Roach | 30893 | \$245.10 | Columbus OH | x8333 | Truliant FCU | Phillippi Investments Inc. |
| 154 | 9/30/17 | Ahmad Becoate | 30883 | \$247.20 | Columbus OH | x3967 | Truliant FCU | Phillipi Investments, Inc. |
| 155 | 9/30/17 | Jeffrey Roach | 56010060 | \$245.10 | Columbus OH | x2687 | Wells Fargo | Spruce LTC Group LLC |
| 156 | 9/30/17 | Jeffrey Roach | 56010060 | \$245.10 | Columbus OH | x2758 | Wells Fargo | Spruce LTC Group LLC |
| 157 | 10/28/17 | Jeffrey Roach | 690330 | \$283.45 | Lewisburg PA | x4558 | Wells Fargo | American Sugar Refining Inc. |
| 158 | 10/28/17 | Jeffrey Roach | 690333 | \$226.76 | Lewisburg PA | x4558 | Wells Fargo | American Sugar Refining Inc. |

| Overt Act | Date | Defendant | Check No. | Amount | Walmart Location | SSN | Alleged Drawee Bank | Alleged Account Holder |
|-----------|----------|-----------------|-----------|----------|------------------|-------|---------------------|-------------------------------|
| 159 | 10/31/17 | Ahmad Becoate | 690203 | \$331.75 | Oak Grove MO | x6382 | Wells Fargo | American Sugar Refining Inc. |
| 160 | 10/31/17 | Ahmad Becoate | 690205 | \$220.25 | Oak Grove MO | x6382 | Wells Fargo | American Sugar Refining Inc. |
| 161 | 11/22/17 | Ahmad Becoate | 22042999 | \$188.53 | Eddystone PA | x8124 | Iberia Bank | Calcasieu Parish School Board |
| 162 | 12/8/17 | Ahmad Becoate | 1398268 | \$220.23 | Davenport IA | x8892 | Wells Fargo | Target Corp. |
| 163 | 12/8/17 | Ahmad Becoate | 1398254 | \$195.10 | Davenport IA | x8892 | Wells Fargo | Target Corp. |
| 164 | 12/14/17 | Ahmad Becoate | 485987 | \$205.85 | Fort Wright KY | x5806 | Wells Fargo | CSL Plasma Inc. |
| 165 | 12/14/17 | Ahmad Becoate | 485981 | \$196.36 | Fort Wright KY | x5806 | Wells Fargo | CSL Plasma Inc. |
| 166 | 12/19/17 | Nathaniel Jones | 51234497 | \$229.02 | Winston-Salem NC | x1866 | NC State Treasurer | State of NC |
| 167 | 12/19/17 | Nathaniel Jones | 51234450 | \$199.99 | Winston-Salem NC | x1866 | NC State Treasurer | State of NC |
| 168 | 5/8/18 | Jeffrey Roach | 653379 | \$150.40 | Parkesburg PA | x0048 | Capital One | C.C. |
| 169 | 5/8/18 | Jeffrey Roach | 653379 | \$150.40 | Parkesburg PA | x0048 | Capital One | C.C. |
| 170 | 5/8/18 | Jeffrey Roach | 70054927 | \$237.40 | Lancaster PA | x6102 | Citibank | CMGRP, Inc. |
| 171 | 5/8/18 | Jeffrey Roach | 70054875 | \$439.65 | Lancaster PA | x6102 | Citibank | CMGRP, Inc. |
| 172 | 5/8/18 | Jeffrey Roach | 70054962 | \$146.37 | East Lampeter PA | x1683 | Citibank | CMGRP, Inc. |

173. On or about January 19, 2017, in the Eastern District of Pennsylvania, defendant AHMAD BECOATE rented a vehicle from a car rental agency in Philadelphia and used it to

drive to various Walmart stores in Delaware, Pennsylvania, Ohio, Indiana and Michigan in order to cash counterfeit payroll checks.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH FOUR

(Wire Fraud)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraphs 1 through 24 of Count One are incorporated here.

THE SCHEME

2. Beginning at a date unknown to the grand jury, but believed to be no later than June 2016, and continuing until at least May 2018, the exact dates being unknown to the grand jury, defendants

**AHMAD BECOATE,
JEFFREY ROACH,
JETHRO RICHARDSON,
NATHANIEL JONES,
JARED MILLER, and
JUQUAN HARVEY**

devised and intended to devise a scheme to defraud Walmart, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

2. The defendants fraudulently obtained checks, identifications and bank account and identification information of various individuals to use in passing and attempting to pass counterfeit checks at Walmart stores throughout the United States.

3. The defendants used counterfeit checks that resembled payroll checks, purportedly drawn upon financial institutions, which were organizations that operated in and affected interstate commerce.

4. The defendants used bank account numbers of actual victim businesses, including SEPTA, which were organizations and operated in and affected interstate commerce.

5. The defendants flew via commercial airlines to various states including Arizona, Texas and Utah, among others, where they rented cars and drove from place to place to various Walmart stores for the purpose of cashing counterfeit payroll checks.

6. The defendants presented, attempted to cash, and cashed, counterfeit payroll checks at various Walmart stores in the Eastern District of Pennsylvania and elsewhere. The presentation of counterfeit payroll checks at Walmart stores caused the checks to be presented for payment to the financial institutions on which the counterfeit checks purported to be drawn.

7. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

**AHMAD BECOATE,
JEFFREY ROACH,
JETHRO RICHARDSON,
NATHANIEL JONES,
JARED MILLER, and
JUQUAN HARVEY**

for the purpose of executing the scheme, and attempting to do so, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, each transmission constituting a separate count:

| COUNT | DATE | DESCRIPTION OF WIRE |
|-------|-------------------|---|
| 2 | November 22, 2017 | electronic transmission of counterfeit check information and fraudulent identification information from Walmart store in Eddystone PA to FSI's servers in St. Petersburg FL and Chicago IL |
| 3 | May 8, 2018 | electronic transmission of counterfeit check information and fraudulent identification information from Walmart store in Parkesburg PA to FSI's servers in St. Petersburg FL and Chicago IL |

| | | |
|---|-------------|--|
| 4 | May 8, 2018 | electronic transmission of counterfeit check information and fraudulent identification information from Walmart store in Lancaster PA to FSI's servers in St. Petersburg FL and Chicago IL |
|---|-------------|--|

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FIVE

(Uttering Counterfeit Securities of an Organization)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraph 23 of Count One is incorporated here.
2. On or about November 22, 2017, at Eddystone, in the Eastern District of Pennsylvania, defendant

AHMAD BECOATE

knowingly and with intent to deceive, possessed and uttered a counterfeited security of an organization operating in and affecting interstate commerce, that is, a counterfeit check in the amount of \$188.53, purporting to be drawn on an account in the name of C.P. School Board at Iberia Bank, which the defendant presented at a Walmart in Eddystone, Pennsylvania, an organization operating in interstate commerce, to cash.

In violation of Title 18, United States Code, Section 513.

COUNT SIX

(Uttering Counterfeit Securities of an Organization)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraph 23 of Count One is incorporated here.
2. On or about May 8, 2018, at Parkesburg, in the Eastern District of Pennsylvania, defendant

JEFFREY ROACH

knowingly and with intent to deceive, possessed and uttered a counterfeited security of an organization operating in and affecting interstate commerce, that is, a counterfeit check in the amount of \$150.40, purporting to be drawn on an account at Capital One Bank, which the defendant presented at a Walmart in Parkesburg, Pennsylvania, an organization operating in interstate commerce, to cash.

In violation of Title 18, United States Code, Section 513.

COUNT SEVEN

(Uttering Counterfeit Securities of an Organization)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraph 23 of Count One is incorporated here.
2. On or about May 8, 2018, at Lancaster, in the Eastern District of Pennsylvania, defendant

JEFFREY ROACH

knowingly and with intent to deceive, possessed and uttered a counterfeited security of an organization operating in and affecting interstate commerce, that is, a counterfeit check in the amount of \$439.56, purporting to be drawn on an account in the name of CMGRP, Inc. at Citibank, which the defendant presented at a Walmart in Lancaster, Pennsylvania, an organization operating in interstate commerce, to cash.

In violation of Title 18, United States Code, Section 513.

COUNT EIGHT

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about September 30, 2017 in the Eastern District of Pennsylvania and elsewhere, defendant

AHMAD BECOATE

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of R.B., ending in 3967, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT NINE

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about May 9, 2017 in the Eastern District of Pennsylvania and elsewhere, defendant

JEFFREY ROACH

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of K.W., ending in 6992, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TEN

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about April 18, 2017 in the Eastern District of Pennsylvania and elsewhere, defendant

JETHRO RICHARDSON

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of J.S., ending in 4584, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT ELEVEN

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about December 19, 2017 in the Eastern District of Pennsylvania and elsewhere, defendant

NATHANIEL JONES

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of G.H., ending in 1866, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TWELVE

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about April 19, 2017 in the Eastern District of Pennsylvania and elsewhere,

defendant

JARED MILLER

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of K.W., ending in 1605, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THIRTEEN

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about January 31, 2017 in the Eastern District of Pennsylvania and elsewhere, defendant

JUQUAN HARVEY

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of W.N., ending in 9426, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FOURTEEN

(Social Security Fraud)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraphs 1 through 24 and 26 through 31 and the Overt Acts of Count One are

incorporated here.

2. On or about November 22, 2017, in the Eastern District of Pennsylvania,
defendant

AHMAD BECOATE

with intent to deceive, and for the purpose of cashing a counterfeit check at a Walmart store in Eddystone Pennsylvania, falsely represented that a Social Security number ending in 8124 had been assigned to him by the Commissioner of Social Security when in fact such number was not the Social Security number assigned to him.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

NOTICE OF FORFEITURE

THE GRAND JURY CHARGES FURTHER THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, 513 and 1343 charged in this Indictment, defendants

**AHMAD BECOATE,
JEFFREY ROACH,
JETHRO RICHARDSON,
NATHANIEL JONES,
JARED MILLER, and
JUQUAN HARVEY**

shall forfeit to the United States of America any property which constitutes or is derived from proceeds obtained directly or indirectly from the commission of such offenses, including but not limited to:

- (a) as to defendant AHMAD BECOATE, the sum of \$132,739.11 in United States currency;
- (b) as to defendant JEFFREY ROACH, the sum of \$190,587.13 in United States currency;
- (c) as to defendant JETHRO RICHARDSON, the sum of \$86,650.62 in United States currency;
- (d) as to defendant NATHANIEL JONES, the sum of \$8,198.47 in United States currency;
- (e) as to defendant JARED MILLER, the sum of \$4,378.83 in United States currency; and
- (f) as to defendant JUQUAN HARVEY, the sum of \$18,559.16 in United States currency.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by 982(b), to seek forfeiture of any property of said defendant up to the value of said property listed above as being subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

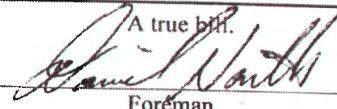
A TRUE BILL:



GRAND JURY FOREPERSON

for Ronald Harrel
WILLIAM M. McSWAIN
United States Attorney

A true bill.


Paul Wirth
Foreman

Filed in open court this _____ day,
Of _____ A.D. 20____

Clerk

Bail, \$ _____